

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

JUSTIN W. JENKINS, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

CORTEVA, INC., et al.

Defendants.

CASE NO. 1:22-CV-1976-RLY-DLP

**DEFENDANTS' JOINT MOTION TO TRANSFER TO MIDDLE  
DISTRICT OF NORTH CAROLINA PURSUANT TO 28 U.S.C. § 1404(a)**

Defendants Syngenta Crop Protection AG, Syngenta Corporation and Syngenta Crop Protection, LLC (together, “Syngenta”), Corteva, Inc. (“Corteva”), CHS Inc. (“CHS”), and Nutrien Ag Solutions, Inc. (“Nutrien”) (collectively, “Defendants”), by and through their undersigned attorneys and pursuant to 28 U.S.C. § 1404(a), respectfully move to transfer this action to the United States District Court for the Middle District of North Carolina.

Defendants move to transfer because, on balance, North Carolina is a significantly more convenient forum to hear this action, and transfer would limit otherwise duplicative judicial efforts. There are pending actions in the Middle District of North Carolina, filed both by government and private plaintiffs, based upon the same alleged facts and involving the same causes of action asserted here. The private plaintiffs’ cases have already been consolidated, and they are coordinating with the government plaintiffs. In support of this Motion, Defendants rely upon the Memorandum in Support of Defendants’ Joint Motion to

Transfer, which is being filed contemporaneously with this Motion, and supporting Declarations.

Respectfully submitted this 22nd day of November, 2022.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of November, 2022, I caused the foregoing JOINT MOTION TO TRANSFER TO MIDDLE DISTRICT OF NORTH CAROLINA PURSUANT TO 28 U.S.C. § 1404(a), and all attachments thereto, to be filed electronically with the Clerk of Court via the Court's CM/ECF system. Counsel for all parties in this case, listed below, are registered CM/ECF users and will be served by the CM/ECF System:

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